

To: FCC
From: Anthony W. Hackenberg (Amateur Radio Callsign WA8SSQ)
Re: Proceeding# 04-37 & 03-104
Date: 07 June 2004

Dear Commissioners:

Do not allow Broadband Over Power Line (BPL) to be deployed any further UNTIL serious protection is in place to protect licensed services from the BPL-generated, RF pollution (interference on the airways).

Do not underestimate the widespread geographical range that pollution will spread across. Do not underestimate the serious technical challenges (requiring as yet unknown technologies) to reduce that pollution to a degree that will protect licensed services.

Recent field tests, by the ARRL and other parties, demonstrate that BPL-generated RF pollution seriously impacts licensed services in the high frequency bands. In particular, the ARRL tests show such a severe impact as to make communication via amateur radio an impossibility. Moreover, they show that this impact extends a considerable distance from the pollution's point source.

Thus, my opposition to BPL is based on the interference it will cause to licensed services, including Amateur Radio, and the detrimental impact it will have on others that listen to short wave radio. Years ago, astronomy in the United States fought a battle against "light pollution" that was making night time observations more and more difficult. Today, licensed services see the battle against BPL in a similar light: a must win fight against "RF pollution" fouling up the airways.

Your rules and regulations mandate that you protect the airways from such unwanted and unnecessary pollution. You are duty bound to protect licensed services.

Amateur Radio is one of those licensed services that will be adversely impacted if you fail to carry out that protective duty by stopping further deployment of BPL until adequate safeguards are in place. Otherwise, the valuable public service function provided by Amateur Radio will be put at grave risk. When the horrific terrorist attacks occurred against the World Trade Center and Pentagon on 9/11, Amateur Radio proved its value again by providing emergency communications backup and helping survivors contact loved ones. In light of the ongoing terrorist threat that we now face, I firmly believe that it is unreasonable to hamper this valuable - and free - service with a known source of RF pollution.

Adequate safeguards mean more than just accepting the power industry's assertions that BPL interference is minimal and can be handled on a case-by-case basis. The FCC must scrutinize more carefully and be much more skeptical about these claims. Indeed, the power industry's track record in dealing with interference caused by mal-functioning

transformers does not bode well for adequate handling of complaints of BPL-generated interference.

The above risk of crippling licensed services with BPL-generated pollution is bad enough. When coupled with the fact that BPL is not necessary, it makes any decision to allow further widespread deployment of BPL appear to be unreasonable, arbitrary and capricious. There are other alternatives available for broadband that do not interfere with the licensed services, including cable, DSL and satellite services (DirectWay).

BPL has another negative aspect: transmissions by licensed services can disrupt the information flowing in the BPL pipeline. Does the FCC really want to open another "Pandora's box" of having to deal with angry BPL customers accusing licensed service operators of disrupting downloads of files on their personal computers?

In closing, BPL technology is not required to accomplish the goal of spreading broadband internet access to more people. BPL technology has too many "warts" and puts valuable licensed services at too high a risk for too little benefit. Thus, I strongly urge you to prevent BPL from becoming a major RF pollutant in our nation's airways.

Thank you for considering my comment.

Respectfully submitted,

Anthony W. Hackenberg
Amateur Radio Operator (Callsign WA8SSQ)
7280 Bear Swamp Road
Wadsworth, OH 44281-8444
Phone: 330-334-4900 (home) or 216-433-5201 (work)
Email: tony.hackenberg@att.net